

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

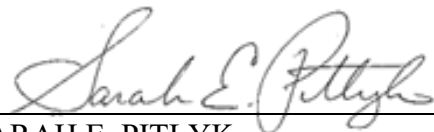
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	No. 4:23-cr-00728-SEP-1
)	
RONALD O. PERKINS,)	
)	
Defendant.)	

MEMORANDUM AND ORDER

Before the Court is Defendant’s Motion in Limine to exclude evidence “related to a person passing and/or attempting to pass counterfeit currency” in three Illinois municipalities. *See* Doc. [71] at 1. In its briefing and at the final pretrial conference, the Government demonstrated that the evidence it proposes to admit relating to counterfeit currency¹ qualifies as *res gestae*, in that it explains how the Defendant was identified as a suspect for the charged crimes; it is probative of identity and modus operandi; and it rebuts statements made by Defendant. The probative value of the *res gestae* evidence the Government proposes to admit is not substantially outweighed by the danger of unfair prejudice to the Defendant. *See* Fed. R. Evid. 403. Evidence of creating and/or passing counterfeit currency “does not involve any violent conduct or a firearm and is not ‘so inflammatory on its face as to divert the jury’s attention from the material issues in the trial.’” *United States v. Richardson*, 40 F.4th 858, 868 (8th Cir. 2022) (quoting *United States v. Huyck*, 849 F.3d 432, 440 (8th Cir. 2017)). And any risk of prejudice can be mitigated further by the Government’s proposed limiting instruction. *See* Doc. [76] at 26. Accordingly,

IT IS HEREBY ORDERED that Defendant’s Motion in Limine to exclude evidence related to Defendant’s alleged involvement in passing and/or attempting to pass counterfeit currency, Doc. [71], is **DENIED**.

Dated this 27th day of March, 2025.


 SARAH E. PITLYK
 UNITED STATES DISTRICT JUDGE

¹ Nothing in this ruling precludes Defendant from objecting to evidence other than that identified in the Government’s briefing of the motion in limine, Doc. [77] at 2, nor from objecting to the introduction of the same evidence on other grounds.